

Exhibit 4

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

CIVIL ACTION NO.: 2:22-cv-02789-TLP-CGC

INTERNATIONAL PAPER COMPANY,)
Plaintiff,)
v.)
BEAZLEY INSURANCE COMPANY, INC., AND)
ZURICH AMERICAN INSURANCE COMPANY,)
Defendants.)
)

REMOTE VIDEO RECORDED DEPOSITION OF SHIV
KUMAR SEETHARAMAN, a witness called by Defendant,
Beazley Insurance Company, Inc., pursuant to the
Federal Rules of Civil Procedure before Amy Marascio,
a Court Reporter and Notary Public in and for the
Commonwealth of Massachusetts, on Thursday, January
11, 2024, commencing at 12:00 p.m.

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Veritext Legal Services

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I N D E X

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
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SHIV KUMAR SEETHARAMAN

(By Mr. Murphy)	7
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(By Mr. Sylvester)	12
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NUMBER	DESCRIPTION	PAGE
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(There were no exhibits offered.)

P R O C E E D I N G S

1
2 VIDEOGRAPHER: We are now going on the
3 record at approximately 12 noon p.m. Eastern
4 Standard Time. Today's date is January 11,
5 2024. This is Media Unit Number 1 of the
6 video recorded deposition of Shiv Kumar
7 Seetharaman taken in the matter of
8 International Paper Company versus Beazley
9 Insurance Company, Inc., et al. It is filed
10 in the United States District Court for the
11 Western District of Tennessee. The case
12 number is 2:22-CV-02789-TLP-CGC. This
13 deposition is being held via Zoom
14 technology.

15 My name is Kevin Gallagher. I am the
16 videographer, and the court reporter is Amy
17 Marascio. We're both from the firm of
18 Veritext Legal Solutions. At this time the
19 attorneys present in the deposition will
20 identify themselves and their affiliations
21 for the record.

22 MR. SYLVESTER: This is John Sylvester
23 from the law firm K&L Gates along with my
24 colleague Nathan Townsend and in-house

1 counsel Mary Jane Palmer representing
2 International Paper Company.

3 MR. MURPHY: Gene Murphy with Robinson
4 and Cole on behalf of the defendant Beazley
5 Insurance Company.

6 MR. FISHMAN: My name is Randy Fishman.
7 I represent the witness, and as I've
8 previously indicated, I would like to put a
9 statement on the record preliminary. Now
10 would be an appropriate time.

11 THE WITNESS: My name is Shiv Kumar
12 Seetharaman. After consultation and with
13 advice of counsel, it is my intention to
14 exercise my rights under the Fifth Amendment
15 as to any questions involving DGS, MSD and
16 any dealings involving International Paper.

17 MR. FISHMAN: You may proceed.

18 VIDEOGRAPHER: Now the court reporter
19 will swear in the witness and we can
20 proceed.

21 SHIV KUMAR SEETHARAMAN, after being
22 satisfactorily identified and duly sworn by
23 the Notary Public, was examined and
24 testified as follows:

DIRECT EXAMINATION

BY MR. MURPHY:

Q. Good morning, sir. Again, my name is Gene Murphy. I represent the insurance company, Beazley Insurance Company, in this coverage action between International Paper and Beazley. If you can please state your full name for the record along with your address.

A. Yeah, my full name is Shiv Kumar Seetharaman, and my address is 16 East Carol Avenue, Burlingame, California 94010.

Q. Okay. Have you ever been deposed before, sir?

A. After consultation and advice of counsel, it is my intention to exercise my rights under the Fifth as to any questions involving DGS, MSD and International Paper.

Q. Okay, and I'm just asking you if you've ever been deposed before. I want to know if you're familiar with the process which is basically a question and answer process under oath.

A. No, I have not been deposed before.

Q. Okay, and I heard your earlier statement, and we obviously will respect that. Let me just say that it's a question and answer format. I'm

1 going to pose questions to you. You'll respond
2 as appropriate in conjunction with your guidance
3 from counsel. I just ask that, you know, you
4 respond to those questions, and obviously keep in
5 mind that we have a court reporter that's
6 transcribing it for the record. Is that all
7 acceptable?

8 A. Yes.

9 Q. Okay, and I'd ask that, you know, I know we are
10 in a video Zoom context. Both of us have to
11 verbalize our questions and answers so that there
12 is no issue there. With that said, could you
13 just briefly describe for us your education, sir?

14 A. Yes. I have a bachelor's degree in chemical
15 engineering, a master's degree in chemistry and a
16 master's degree in chemical engineering.

17 Q. Okay. And you may have answered this, but do any
18 of those degrees constitute PhDs in chemistry or
19 chemical engineering?

20 A. No.

21 Q. Okay, and where did you obtain those degrees?

22 A. The master's in chemistry and the bachelor's in
23 chemical engineering all came from India, and the
24 master's degree in chemical engineering from

1 Oklahoma State University.

2 Q. I'm sorry, I didn't hear the last institution.

3 A. Oklahoma State University.

4 Q. And when did you obtain the master's from
5 Oklahoma State University?

6 A. 1985 I -- I think 1985, '85 I think.

7 Q. And with regard to the other two degrees, can you
8 give us the approximate time of obtaining the
9 degrees?

10 A. 1983.

11 Q. Both the Bachelor's of Science and the master's
12 were --

13 A. Yes.

14 Q. -- both in 1983?

15 A. Yes.

16 Q. And what's the name of the institution in India
17 that you obtained those degrees from?

18 A. Birla Institute of Technology and Science.

19 Q. Can you tell us -- I don't need details, but can
20 you tell us what type of employment you pursued
21 after obtaining your degrees, sir?

22 A. After consultation and advice of counsel, it is
23 my intention to exercise my rights under the
24 Fifth as to any questions moving forward.

1 Q. Okay, I just want to confirm, you are here today
2 as a corporate representative for DGS and Mid-
3 South; isn't that correct, sir?

4 A. That is correct.

5 Q. Okay, and could you just -- with regard to DGS,
6 for the record, could you just state what that
7 stands for, the corporate name?

8 A. Diversified Global Sourcing, Inc.

9 Q. Okay, and Mid-South, what is the full corporate
10 name?

11 A. Mid-South Diversity, Inc.

12 Q. All right. Do those companies still exist as
13 corporate entities today?

14 A. It is my intention to exercise my rights under
15 the Fifth Amendment.

16 Q. Okay, I have a couple additional questions I'm
17 going to pose, and we'll work through those, but
18 it should only take two or three minutes. What
19 was your position at DGS, sir?

20 A. It is my intention to exercise my rights under
21 the Fifth Amendment as to the questions involving
22 DGS and MSD.

23 Q. What was your position with regard to Mid-South?

24 A. It is my intention to exercise my Fifth, my

1 rights under the Fifth.

2 Q. What was the nature of the business services that
3 Mid-South provided its customers?

4 A. It is my intention to exercise my rights under
5 the Fifth Amendment.

6 Q. What was the nature of the business services that
7 DGS provided its customers?

8 A. After consultation and advice of counsel, it is
9 my intention to exercise my rights under the
10 Fifth Amendment.

11 Q. Do you have any relatives that have worked at
12 International Paper in the past?

13 A. After consultation and advice of counsel, it is
14 my intention to exercise my rights under the
15 Fifth Amendment.

16 Q. Do you know somebody who is sometimes referred to
17 as Jag?

18 A. After consultation and advice of counsel, it is
19 my intention to exercise my rights under the
20 Fifth Amendment.

21 Q. Is DGS a diverse company?

22 A. After consultation and advice of counsel, it is
23 my intention to exercise my rights under the
24 Fifth Amendment.

1 Q. Is Mid-South a diverse company?

2 A. After consultation and advice of counsel, it is
3 my intention to exercise my rights under the
4 Fifth Amendment.

5 MR. MURPHY: Okay, thank you. I have no
6 further questions at this time.

7 CROSS-EXAMINATION

8 BY MR. SYLVESTER:

9 Q. Mr. Kumar, this is John Sylvester, counsel for
10 International Paper, and I have about three
11 questions for you. When you have said in
12 response to Mr. Murphy's questions that you
13 exercise your rights under the Fifth Amendment,
14 just so that we're clear on the record, do you
15 mean that you are invoking the privilege under
16 the Fifth Amendment of the U.S. Constitution
17 against answering questions that may tend to
18 incriminate you in a potential criminal
19 proceeding?

20 A. After consultation and advice of counsel, it is
21 my intention to exercise my rights under the
22 Fifth Amendment to any questions involving DGS,
23 MSD and any dealings involving International
24 Paper.

1 Q. And if I were to ask you any questions about the
2 activities of DGS and Mid-South, not just with
3 International Paper but also with majority
4 suppliers of speciality chemicals during the
5 period 2011 to 2019, would your answer be the
6 same?

7 A. After consultation and advice of counsel, it is
8 my intention to exercise my rights under the
9 Fifth Amendment.

10 Q. If I were to ask you any questions about the
11 criminal investigation of Sitaraman Jagannath in
12 connection with the charges of International
13 Paper that he was engaged in employee theft, what
14 would your answer be?

15 A. After consultation and advice of counsel, it is
16 my intention to exercise my rights under the
17 Fifth Amendment.

18 Q. And then finally, if I were to ask you any
19 questions about the financial accounting and tax
20 payment practices of either DGS or Mid-South,
21 what would your answer be?

22 A. After consultation and advice of counsel, it is
23 my intention to exercise my rights under the
24 Fifth Amendment.

1 MR. SYLVESTER: At this time in lieu --
2 in view of Mr. Kumar's invocation of his
3 rights, all of the questions that I would
4 have for him are encompassed within his
5 prior answers that he would plead the Fifth
6 Amendment against self-incrimination, and so
7 there's no point in proceeding to ask those
8 questions given that we will get the same
9 answers, so I have no further questions at
10 this time.

11 MR. MURPHY: I have no follow up with
12 regard to my questions to Mr. Kumar, DGS or
13 Mid-South, understanding that any further
14 questions will result in the same response
15 and the invocation of the Fifth Amendment.
16 Thank you.

17 MR. FISHMAN: Thank you, gentlemen.

18 VIDEOGRAPHER: We are going off the
19 record at approximately 12:12 p.m.

20 (Whereupon, deposition was concluded at
21 12:12 p.m.)
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ERRATA SHEET

CASE: INTERNATIONAL PAPER COMPANY V. BEAZLEY
INSURANCE COMPANY, INC., AND ZURICH AMERICAN
INSURANCE COMPANY

DEPOSITION OF: SHIV KUMAR SEETHARAMAN

PAGE	LINE	PRESENTLY READS	SHOULD READ
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SIGNATURE PAGE

I, SHIV KUMAR SEETHARAMAN, hereby certify
that I have read the foregoing transcript of my
testimony given in the aforementioned matter, and
further certify that said transcript is a true,
accurate and complete record of said testimony.

SHIV KUMAR SEETHARAMAN

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C E R T I F I C A T E

COMMONWEALTH OF MASSACHUSETTS

COUNTY OF NORFOLK, ss.

I, Amy Marascio, a Court Reporter and Notary Public in and for the Commonwealth of Massachusetts, do hereby certify that the foregoing remote video deposition of SHIV KUMAR SEETHARAMAN, was taken before me on January 11, 2024. The said witness was satisfactorily identified and duly sworn before the commencement of his testimony; that the said testimony was taken audiographically by myself and then transcribed under my direction.

To the best of my knowledge, the within transcript is a complete, true and accurate record of said deposition. I am not connected by blood or marriage with any of the said parties, nor interested directly or indirectly in the matter in controversy.

In witness whereof, I have hereunto set my hand and Notary Seal this 24th day of January 2024.

Amy Marascio

Amy Marascio, Notary Public

My Commission Expires:

May 31, 2030

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted

fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.